



GLENN GREENBERG

666 Third Avenue, 20<sup>th</sup> floor  
New York, NY 10017-4132  
Main (212) 451-2900  
Fax (212) 451-2999  
ggreenberg@rc.com  
Direct (212) 451-2933

**VIA ECF**

Application granted.

February 12, 2024

SO ORDERED.

The Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams  
February 13, 2024

Re: *Mitchell, et al. v. Gannett Co., Inc., et al.*, 24-cv-00284 (RA)(RWL) (S.D.N.Y.)

Dear Judge Abrams:

We represent Southern Community Newspapers, Inc., d/b/a The Albany Herald, Clayton Daily, Rockdale Newton Citizen, Henry Herald, and Jackson Progress-Argus (“SCNI”) and Times-Journal, Inc. d/b/a Gwinnett Daily Post (“TJI”). We write pursuant to Rules 1(D) and 4(E) of this Court's Individual Practices to respectfully request an adjournment of the deadline for SCNI and TJI to answer or otherwise respond to the Complaint to allow the parties time to discuss a possible substitution of parties and to have a broader discussion of the schedule in this case.

Based on the docket, the deadline for SCNI to respond to the complaint may have been February 8, 2024, and the deadline for TJI to respond to the complaint may be February 15, 2024.

SCNI and TJI respectfully request that the deadline for them to answer or otherwise respond to the Complaint be extended to and including **March 8, 2024**. This is the same deadline to which Plaintiff and Defendant Gannett Co., Inc. have agreed, and which the Court so ordered on February 8, 2024 (Dkt. 26).

Neither SCNI nor TJI have previously sought an extension of a deadline in this case. Plaintiffs' counsel has consented to this extension.

Thank you for your consideration of this request.



The Honorable Ronnie Abrams  
February 12, 2024  
Page 2

Respectfully,

/s/ Glenn Greenberg

Glenn Greenberg

cc: All Counsel of Record (*via* ECF)